

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

MICHAEL POSTAWKO, et al.)	
)	
Plaintiffs,)	
)	
v.)	No. 16-CV-4219-NKL
)	
MISSOURI DEPARTMENT OF)	
CORRECTIONS, et al.,)	
)	
Defendants.)	

STIPULATION OF DISMISSAL OF PLAINTIFF MICHAEL JAMERSON ONLY

COME NOW the parties, by and through their respective counsel, and stipulate to the dismissal with prejudice of Plaintiff Michael Jamerson's claims in this case pursuant to FED. R. Civ. P. 41(a)(1)(A)(ii). This stipulation applies to Mr. Jamerson only and has no impact on Mr. Postawko and Mr. Baker's remaining claims in the case or on the class-wide causes of action. The parties agree that this stipulation of dismissal shall not count as a "strike" against Mr. Jamerson for purposes of the Prison Litigation Reform Act, 42 U.S.C. § 1997e and 28 U.S.C. § 1915(g).

Respectfully submitted,

By: /s/ Amy E. Breihan
Anthony E. Rothert, #44827
Jessie Steffan, #64861
Omri E. Praiss, #41850
American Civil Liberties Union
of Missouri Foundation
906 Olive Street, Suite 1130
St. Louis, Missouri 63108
Phone: (314) 652-3114
Fax: (314) 652-3112
trothert@aclu-mo.org
jsteffan@aclu-mo.org

Gillian R. Wilcox, #61278
American Civil Liberties Union
of Missouri Foundation

By: /s/ Jennifer Baumann (w/ consent)
ERIC S. SCHMITT, Attorney General
John W. Taylor
Jennifer Baumann
Jason K. Lewis
Assistant Attorneys General
815 Olive Street
Saint Louis, MO 63101
Phone: (314) 340-7861
Fax: (314) 340-7029
John.Taylor@ago.mo.gov
Jennifer.Baumann@ago.mo.gov
Jason.lewis@ago.mo.gov

406 West 34th Street, Suite 420
Kansas City, Missouri 64111
Phone: (816) 470-9938
Fax: (314) 652-3112
gwilcox@alco-mo.org

Amy E. Breihan, #65499
Megan G. Crane, #71624
RODERICK & SOLANGE
MACARTHUR JUSTICE CENTER
3115 South Grand Blvd., Suite 300
St. Louis, MO 63118
Phone: (314) 254-8540
Fax: (314) 254-8547
amy.breihan@macarthurjustice.org
megan.crane@macarthurjustice.org

Elizabeth L. Henthorne (*pro hac vice*)
Amelia I. P. Frenkel (*pro hac vice*)
Anastasia M. Pastan (*pro hac vice*)
Tamarra Matthews Johnson (*pro hac vice*)
Wilkinson Walsh + Eskovitz, LLP
2001 M Street NW
10th Floor
Washington, DC 20036
Phone: (202) 847-4000
Fax: (202) 847-4005
bhenthorne@wilkinsonwalsh.com
afrenkel@wilkinsonwalsh.com
apastan@wilkinsonwalsh.com
tmattthewsjohnson@wilkinsonwalsh.com

Meghan C. Cleary (*pro hac vice*)
Wilkinson Walsh + Eskovitz, LLP
130 West 42nd Street, Suite 1402
New York, NY 10036
Direct: (424) 291-9669
Fax: (202) 847-4005
mcleary@wilkinsonwalsh.com

Counsel for Plaintiffs

Dated: November 19, 2019

Justin D. Smith
Deputy Attorney General for Special
Litigation
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-0304
Fax: (573) 751-0774
Justin.Smith@ago.mo.gov
*Counsel for defendants MDOC,
Precythe, and Hardy*

By: /s/ Matthew B. Reeves (w/ consent)
Dwight A. Vermette
ECKENRODE-MAUPIN, Attorneys at Law
11477 Olde Cabin Rd., Ste. 110
St. Louis, MO 63141
(314) 726-6670 (Telephone)
(314) 726-2106 (Fax)
dav@eckenrode-law.com

William R. Lunsford
Matthew B. Reeves
Maynard, Cooper & Gale, P.C.
655 Gallatin Street
Huntsville, AL 35801
Telephone: (256) 551-0171
Facsimile: (256) 512-0119
blunsford@maynardcooper.com
mreeves@maynardcooper.com
Counsel for defendant Corizon, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of November, 2019, a true and correct copy of the foregoing was electronically filed using the Court's online case filing system, which will send notice to all counsel of record.

By: /s/ Amy E. Breihan